

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 17-10728-REF  
DANIEL J. LYTWYN and :  
ANGELA M. LYTWYN : Chapter 13  
Debtors. :

**DEBTORS' RESPONSE TO MOTION OF LAKEVIEW LOAN SERVICING, LLC  
FOR RELIEF FROM THE AUTOMATIC STAY**

WHEREFORE, Debtors respectfully request this Honorable Court deny Movant's request.

Respectfully submitted,  
LAW OFFICE OF STEPHEN M. OTTO, LLC

By: /s/Stephen M. Otto  
Stephen M. Otto, Esq.  
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AND NOW come the Debtors by and through their attorney, Stephen M. Otto, Esquire, and  
file the within Response, of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtors may have been behind with their payments as of the Petition Date, but  
the arrearage was immaterial, and Movant had not accelerated the balance owed by the  
Movant. In way of further answer, Movant's Proof of Claim filed at the outset of these  
proceedings averred a pre-petition arrearage of \$435.57.
6. Denied. Debtors remitted one or more partial payments during the months identified  
by Movant.
7. Denied.
8. Denied.
9. [Sic]
10. Denied.
11. No response necessary.